

EXHIBIT C

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
2 EASTERN DIVISION

3 IN RE: NATIONAL : HON. DAN A.
4 PRESCRIPTION OPIATE : POLSTER
LITIGATION : MDL NO. 2804
5 This document relates to: : Case No. 17-MD-2804
6 The County of Summit, Ohio :
Ohio et al. v. Purdue Pharma :
7 L.P., et al., Case No. :
17-OP-45004 :
8 :
9 The County of Cuyahoga v. :
Purdue Pharma :
L.P., et al., Case No. :
0 18-OP-45090 :

12 - HIGHLY CONFIDENTIAL -
SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

VOLUME II

May 9, 2019

16 Videotaped deposition of
17 CRAIG J. McCANN, Ph.D., CFA, taken
18 pursuant to notice, was held at the law
offices of Morgan Lewis & Bockius, LLP,
19 1111 Pennsylvania Avenue, NW, Washington,
D.C., beginning at 10:03 a.m., on the
above date, before Michelle L. Gray, a
20 Registered Professional Reporter,
Certified Shorthand Reporter, Certified
Realtime Reporter, and Notary Public.

23 GOLKOW LITIGATION SERVICES
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deps@golkow.com

1 Q. Yep.

2 A. I'm just saying that you
3 take the -- the data that we've prepped,
4 and apply these formulas to it, you get
5 particular results.

6 Q. And is that also true not
7 only about whether those algorithms, the
8 assumptions, are appropriate, but also
9 true that you are not making any opinion
10 as to whether they are legally required?

11 A. Right. I think all of these
12 issues are being handled by other
13 experts. I -- as you said a minute ago.
14 And I didn't take it as a pejorative.
15 I'm just serving as a calculator.

16 Q. And in this Paragraph 21 you
17 use the -- the phrase "algorithms" to
18 discuss what's being applied in
19 Section 9. But you also use the word
20 "approaches" later I believe.

21 Are you saying the same
22 thing?

23 So are -- in -- calling it
24 algorithms here in Paragraph 21, are you

1 Q. Anyone come to mind?

2 A. It would be -- it would be
3 something like that list and perhaps
4 more.

5 Q. Anyone in particular that
6 you think you left out earlier that comes
7 to mind?

8 A. No.

9 Q. Did you get any input on
10 these five approaches from any of your
11 discussions with current or former DEA
12 agents?

13 A. No.

14 Q. Did you take any other step
15 to verify with the DEA that any or all of
16 these approaches are appropriate in this
17 setting?

18 A. I'm sorry. I don't know
19 what you mean by any other, but I didn't
20 do anything other than serve as the
21 computer, you referred to me as earlier.
22 I took these approaches and implemented
23 them, applied them to the data. That's
24 what I did.